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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

BOGDAN NICOLESCU,
TIBERIU DANET, AND
RADU MICLAUS,

Defendants.

CASE NO. **16 CR 0224**

MAGISTRATE JUDGE
NANCY A. VECCHIARELLI

MOTION TO SEAL INDICTMENT

JUDGE GAUGHAN

Now comes the United States of America, by and through counsel, Carole S. Rendon, Acting United States Attorney, and Duncan T. Brown, Assistant United States Attorney, and respectfully moves this Court for an order sealing the attached indictment for the following reasons: defendants reside overseas and the evidence exists overseas as well. If the defendants are notified of the indictment they are likely to flee and destroy evidence.

The government further requests this Court to order that an Assistant United States Attorney of the Criminal Division of the United States Attorney's Office for the Northern District of Ohio may obtain, upon request, a certified copy of this indictment should any defendant be

located in another judicial district and a certified copy of this indictment is needed for forwarding to that judicial district. See Rule 6(e)(4) of the Federal Rules of Criminal Procedure.

Respectfully submitted,

CAROLE S. RENDON
Acting United States Attorney

By:



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